

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

KEENAM PARK,
Defendant

Crim. No. 1:20-cr-10128-MLW

**DEFENDANT’S MOTION FOR RECONSIDERATION OF THE COURT’S
AUGUST 11, 2020 ORDER REVOKING PRE-SENTENCING RELEASE**

NOW COMES, Keenam Park (hereinafter “Mr. Park”), through undersigned counsel and respectfully requests that this Honorable Court reconsider its Order dated August 11, 2020, which, *inter alia*, ordered the revocation of Mr. Park’s release under 18 U.S.C. sec. 3143(a)(1). *See Dkt. 49.*

In support of this reconsideration request, Mr. Park respectfully states that he has secured a fixed place of residence¹ pending sentencing in this matter. Mr. Park reports that he has known the owners, a husband and wife, for 5+ years, a friendship that commenced when their respective minor children began attending the same pre-school in Weston, Massachusetts in approximately 2015. Their families have frequently mixed at social events, such as barbecues and children’s birthday parties, and have become very close friends over the years meeting socially almost every week.

Mr. Park has made the owners aware of this pending case.

¹ The residence is a single-family dwelling in Wellesley, Massachusetts, and its owners have been interviewed and approved by U.S. Probation. Given the deadline for filing of this request for reconsideration, the address and the owners’ identifying information is not included in this filing; should the Court instruct, undersigned counsel will immediately file a Motion for Leave to File Under Seal.

On August 13, 2020, Senior U.S. Probation Officer Marlenny Ramdehal investigated and approved this residence and indicated via email to the parties that “Probation is satisfied with this release address.”

Mr. Park has learned greatly from the hearing that occurred in this matter on August 10, 2020), and proposes, should the Court deem it necessary, the re-imposition of a curfew or home detention. Humbly, Mr. Park states that he desires to continue his compliance with all terms and conditions of release.

Lastly, on August 13, 2020, Mr. Park executed the Court’s Third Amended Order Setting Conditions of Release, which is anticipated to be docketed shortly.

On August 13, 2020, undersigned counsel conferenced this motion with the government, through Assistant U.S. Attorney Leslie Wright, who does not oppose this request for reconsideration.

WHEREFORE, Mr. Park respectfully requests this Motion be allowed.

Respectfully Submitted:

KEENAM PARK
By and through his Attorney:

Dated: August 13, 2020

/s/ Vikas S. Dhar
Vikas S. Dhar, BBO No. 657539
vikas@dharlawllp.com



1 Constitution Wharf, Suite 320
1 Constitution Road
Charlestown, Massachusetts 02129
Office: 617.880.6155
Mobile: 617.935.6733
Fax: 617.880.6160

CERTIFICATE OF SERVICE

I, Vikas S. Dhar, hereby certify that a true and accurate copy of this document, and all supporting documents, if any, have been delivered by ECF upon all parties registered with CM/ECF in this matter on the date above.

/s/ Vikas S. Dhar

Vikas S. Dhar